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Attorney for Defendants ANTHONY BUCHER, GRACIE PRODUCTIONS, and
SEVEN13 MUSIC & ENTERTAINMENT

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

HELEN NADEL, et al;

Plaintiffs,

v.

ANTHONY BUCHER, et al;

Defendants.

Case No.: 8:17-CV-00355-SS

JOINT STIPULATION OF
VOLUNTARY DISMISSAL
WITHOUT PREJUDICE;
REQUEST FOR THIS COURT TO
RETAIN JURISDICTION; AND
[PROPOSED] ORDER

1. Pursuant to Federal Rule of Civil Procedure 41(a)(2), Plaintiffs HELEN
NADEL and SOUND PLUS LLC ("Plaintiffs") and Defendants ANTHONY

1 BUCHER, GRACIE PRODUCTIONS, and SEVEN13 MUSIC &
2 ENTERTAINMENT (“Bucher Defendants”) hereby file this joint stipulation.

3
4 2. Plaintiffs and Bucher Defendants have entered into a confidential settlement
5 agreement, dated September 10, 2018, and fully executed on October 5, 2018,

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7 3. Under the terms of the settlement agreement, the Parties are to perform
8 certain acts over an agreed period of time.

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10 4. The settlement agreement requires Plaintiffs to voluntarily dismiss without
11 prejudice all claims against all defendants subject to this Court retaining
12 jurisdiction over the action in order to enforce the settlement agreement.

13
14 5. Whereas, the Parties hereby request that this Court shall retain jurisdiction to
15 the above action in order to enforce the terms of the Settlement Agreement
16 pursuant to Court’s entry of the attached order.

17
18 6. Upon full performance of the matters required under the settlement
19 agreement (which is scheduled to occur on or before August 1, 2021), the Parties
20 shall voluntarily dismiss with prejudice all claims against all defendants pursuant
21 to Federal Rule of Civil Procedure 41(a)(1)(ii).

22
23 7. This dismissal pursuant to Fed. R. Civ. P. 41(a)(2) is without an award of
24 attorney’s fees, interest, or costs to any Party, as each side shall bear their own
25 attorney’s fees and costs.
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27
28

1 NOW, THEREFORE, by and through their respective counsel of record, the
2 Parties hereby stipulate and agree, subject to approval by the Court, that the above-
3 captioned action should be dismissed without prejudice as to Defendants.
4

5 IT IS SO STIPULATED.

6 DATED: October 31, 2018

7 THE FRIED FIRM PLLC
8 ALLEN KRONENBERGER
9 555 West 5th Street, Suite 34011
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10 By: /s/Allen Kronenberger II, Esq
11 Allen Kronenberger #297194
12 Attorney for Plaintiffs

13 DATED: October 31, 2018

14 EHLERS LAW CORPORATION
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